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 ARTHUR J. GALLAGHER & CO.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ARTHUR J. GALLAGHER & CO., a
 Delaware Corporation,

Plaintiff,

vs.

DON TARANTINO, an individual,
 BERNADETTE HEATER, an individual,
 MICHAEL MACHETTE, an individual, and
 SPENCER BRUSH, an individual,

Defendants.

CASE NO.: 20-cv-05505-EMC

**PLAINTIFF ARTHUR J. GALLAGHER
 & CO.'S MOTION TO REMOVE
 INCORRECTLY FILED DOCUMENT;
 [PROPOSED] ORDER**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Plaintiff Arthur J. Gallagher & Co. (“Gallagher”) hereby
3 respectfully requests that an order be granted to remove Docket No. 82-3 from the ECF docket for
4 this matter on the grounds that it was incorrectly filed publicly and not under seal.

5 Gallagher e-filed Docket No. 82-3 (hereafter “McMeel Declaration Part 2”) on April 7, 2022
6 as a part of Gallagher’s opposition to the defendants’ motion for partial summary judgment.
7 Exhibit 37 within the McMeel Declaration Part 2 is comprised of information that Alliant Insurance
8 Services, Inc. has designated as highly confidential. Exhibit 37 was inadvertently omitted from
9 Gallagher’s Administrative Motion to Consider Whether Others’ Material Should be Sealed (ECF
10 No. 81 at 4-5), and an unsealed version of Exhibit 37 was thus inadvertently included in the version
11 of the McMeel Declaration Part 2 that Gallagher filed publicly. An unredacted version of Exhibit
12 37 was submitted to the Court under seal as a part of Docket No. 81-5.

13 Gallagher is following all steps outlined in the Court’s online guidance to remedy this issue:
14 it has emailed a notification of the above issue to the Court’s docket correction email address, it has
15 filed a corrected version of Docket No. 82-3 (see ECF No. 85), and it is working with the ECF
16 HelpDesk to temporarily lock Docket No. 82-3.

17 Gallagher therefore respectfully moves the Court to remove Docket No. 82-3 permanently
18 from the Court’s public docket and ECF.

19 Dated: April 13, 2022

20 By: /s/ Meghan R. McMeel

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25 Attorneys for Plaintiff
26 ARTHUR J. GALLAGHER & CO.
27
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[PROPOSED] ORDER

The Court has now considered Plaintiff Arthur J. Gallagher & Co.'s Motion to Remove Incorrectly Filed Document. Having considered the moving papers before it and finding good cause,

The Court hereby grants the Motion and orders that Docket No. 82-3 be removed from the docket for this matter.

IT IS SO ORDERED.

Dated: _____

By: _____
Hon. Edward M. Chen
United States District Judge